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Attorneys for Debtor(s)
Stanley Mayfield

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT COURT OF CALIFORNIA

In re:

Stanley Mayfield

Debtor(s).

Case No: 16-22134-D-7

Chapter: 07

DCN: UST-1

**REPLY TO THE MOTION OF THE UNITED STATES
TRUSTEE FOR IMPOSITION OF SANCTIONS**

Date: June 15, 2016

Time: 10:00 A.M.

Judge: Honorable Robert Bardwil

Courtroom: 6th Floor, Court Rm 34, Dept D

Pauldeep Bains, an attorney employed at the law firm Bankruptcy Law Group, P.C. ("BLG"), hereby submits this "Reply to the Motion of the United States Trustee for Imposition of Sanctions".

The United States Trustee for the Eastern District of California (the "UST") alleges that Mr. Bains has violated Local Bankruptcy Rule 9004-1(c) and requests sanctions of requiring Mr. Bains to complete the on-line training entitled "How to e-File in the eCalWebFiling Website" be imposed on Mr. Bains. Even though both BLG and Mr. Bains have the utmost respect for the UST and the rules that they impose, BLG and Mr. Bains both adamantly deny that any violation of Local Bankruptcy Rule 9004-1(c) occurred and assure to the Court that the UST is incorrect in their allegation.

In short, Mr. Bains possessed a copy of the originally signed documents that were not only filed in this case (Docket Numbers 1, 3 and 4) but were also timely sent to the UST upon their request. Thus, since Mr. Bains filed the originally signed documents with the Court and moreover, sent the originally signed documents to the UST upon their request, no violation of Local Rule 9004-1(c) occurred.

In support of this Reply, Mr. Bains will rely on the following:

- An analysis of Local Rule 9004-1(c) and 9004-1(d)

- Memorandum of Points and Authorities in Support of the Reply to the Motion of the United States Trustee for Imposition of Sanctions filed concurrently with this Reply
- Declaration of Pauldeep Bains in Support of the Reply to the Motion of the United States Trustee for Imposition of Sanctions filed concurrently with this Reply
- Exhibit 1, which is the Petition, Schedules and Statements filed in the above mentioned case (docket entry number 1) and also sent to the UST upon their request. Exhibit 1 can be found at docket entry number 15.
- Exhibit 7, which is a Declaration of the Debtor in the above mentioned case. Exhibit 7 can be found at docket entry number 15.

WHEREFORE, Mr. Pauldeep Bains and BLG respectfully request:

The Motion of the United States Trustee for Imposition of Sanctions be denied.

DATED: 5/31/2016

By:



Pauldeep Bains, Esq.
Bankruptcy Law Group, PC

By:

/s/ Chad M Johnson

Chad Johnson, Esq.
Bankruptcy Law Group, PC